

Before The Department Of Transportation

1757  
QA

OST- 95-206-17

**U.S. - TORONTO SERVICE  
PROCEEDING**

**Docket 50168**

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DEPARTMENT OF TRANSPORTATION  
95 APR -4 PM 3:52  
DOCKET SECTION

**Rebuttal Exhibits  
Of  
DELTA AIR LINES, INC.**



**NEW ROUTE OPPORTUNITIES (U.S. - CANADA)**

**Rebuttal Exhibits**

<b><u>Exhibit Number</u></b>	<b><u>Title</u></b>	<b><u>Number Of Pages</u></b>
	<b><u>Atlanta - Toronto</u></b>	
DL-RT-1	Rebuttal Testimony Of Douglas W. Blissit	6
DL-R-101	Atlanta Is The Only Proposed Gateway In The Underserved Southeast Region	1
DL-R-102	Among The Applicant Carriers, Delta's Atlanta Proposal Provides The Only Service To Twenty-Eight Underserved Southeast Markets.	1
DL-R-103	The Other Four Toronto Applicants Propose Gateways In Regions With Abundant U.S. Flag Service To Toronto	1
DL-R-104 Thru DL-R-106	Not Used	1
DL-R-107	Delta Expects To Carry Far More Toronto Passengers Than Any Other Applicant.	1
DL-R-108	Delta Expects To Carry More Local Passengers Than Any Other Applicant.	1
DL-R-109	Delta Will Provide More Seats Than Any Other Applicant.	1
DL-R-110	The Local Atlanta-Toronto Market Is Much Larger Than The Local Markets That Do Not Currently Have U.S. Flag Nonstop Service.	1
DL-R-111	Atlanta Is Larger Than Any Other Proposed Gateway (Based On Applicant's Departures).	1

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<b><u>Exhibit Number</u></b>	<b><u>Title</u></b>	<b><u>Number Of Pages</u></b>
DL-R-112	Atlanta Is Larger Than Any Other Proposed Gateway (Based On Applicant's Enplanements).	1
DL-R-113	Atlanta Is Larger Than Any Other Proposed Gateway (Based On Markets Served By Applicants).	1
DL-R-114	Delta's Atlanta Hub Offers More Than Double The Number Of Daily Seat Departures Than Any Other Applicant's Gateway Hub.	1
DL-R-115	Delta Will Provide Online Connections To More Cities That Do Not Already Receive Nonstop Service To Toronto Than Northwest, TWA, Or Continental.	1
DL-R-116	Delta Will Provide More First Nonstop-To-Nonstop Services Than Any Other Applicant.	1
DL-R-117	USAir's Pittsburgh Proposal Will Duplicate Their Existing Service From Philadelphia In Forty-Six Markets.	1
DL-R-118	Nearly Sixty-Four Percent Of USAir's Pittsburgh Forecast Duplicates Toronto Markets USAir Already Serves Over Philadelphia.	2
DL-R-119	Thirty-Four Percent of USAir's Forecast Traffic Is In Markets With Nonstop Service.	1

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<b><u>Exhibit Number</u></b>	<b><u>Title</u></b>	<b><u>Number Of Pages</u></b>
DL-R-120	Twenty-Two Percent Of USAir's Forecast Is In Markets With More Than Two Hours Connecting Time.	1
DL-R-121	USAir Forecasts 76 Connecting Services With A Connection Time Exceeding 2 Hours.	1
DL-R-122	Pennsylvania Should Not Receive Its Third Toronto Designation Before Atlanta Receives Its First.	1
DL-R-123	USAir's Pittsburgh-Toronto Proposed Schedules Wingtip Existing Services.	1
DL-R-124	USAir's Proposed Single-Plane Service Provides No Improvement In Elapsed Time Over Existing Services.	1
DL-R-125	The New York Metropolitan Area Has Comprehensive New York/Newark-Toronto Service.	1
DL-R-126	The New York/Newark Area Has The Most U.S.-Toronto Service.	1
DL-R-127	Grant Of Continental's Application Will Increase New York City/Newark-Toronto Capacity By Only Ten Percent.	1
DL-R-128	Sixty Percent Of Continental's Forecast Is In Markets With Nonstop Service.	1

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**Rebuttal Exhibits**

<b><u>Exhibit Number</u></b>	<b><u>Title</u></b>	<b><u>Number Of Pages</u></b>
DL-R-129	Continental's Newark-Toronto Proposed Schedules Wingtip Existing Services	2
DL-R-130	Continental's Proposed Single-Plane Service Provides No Improvement In Elapsed Time Over Existing Service.	1
DL-R-131	Twelve Percent Of TWA's Forecast Is In Markets With Nonstop Service.	1
DL-R-132	TWA's St.Louis-Toronto Proposal Forecasts Five Percent Of Total Traffic To Eight Canadian Cities Vs. Delta's Forecast Of No Interline Connections.	1
DL-R-133	TWA's Proposed Single-Plane Services Provides Virtually No Improvement In Elapsed Time Over Existing Service.	1
DL-R-134	Northwest's Minneapolis Proposal Will Duplicate Their Existing Service From Detroit In Thirteen Major O&D Markets.	1
DL-R-135	Over Forty Percent Of Northwest's Minneapolis Forecast Duplicates Markets Northwest Serves Over Detroit To Toronto.	1
DL-R-136	Twenty Cities In Northwest's Toronto Forecast, Representing Over 270,000 Base Year O&D Passengers, Have Single Connections In One Direction Only.	1

**NEW ROUTE OPPORTUNITIES (U.S. - CANADA)**

**Rebuttal Exhibits**

<b>Exhibit Number</b>	<b>Title</b>	<b>Number Of Pages</b>
DL-R-137	Fifteen Percent Of Northwest's Toronto Forecast, Representing Over 16,000 Passengers, Have Single Connections In One Direction Only.	1
DL-R-138	Twelve Cities In Northwest's Toronto Forecast Have 75% Market Shares, Representing Over 6,400 O&D Passengers, But Have Single Connections In One Direction Only.	1
DL-R-139	Eleven Percent Of Northwest's Forecast Is In Markets With Nonstop Service.	1
DL-R-140	Northwest's Proposed Single-Plane Service Provide Virtually No Improvement In Elapsed Time Over Existing Service.	1
DL-R-141	Continental And Air Canada Are Partners, Not Competitors.	2

**REBUTTAL TESTIMONY OF  
DOUGLAS W. BLISSIT,  
SYSTEM MANAGER-MARKET ANALYSIS**

I am Douglas W. Blissit, Delta Air Lines, Inc.'s System Manager of Market Analysis. I sponsor all of Delta's rebuttal exhibits in this proceeding. The exhibits were prepared under my supervision and direction and are true and correct to the best of my information, knowledge and belief.

Five airlines have submitted proposals to operate one of the two U.S.-Toronto Year-One opportunities available under the U.S.-Canada bilateral agreement. Delta's Atlanta-Toronto proposal is the clear first choice for an award in this proceeding.

Delta is the only applicant proposing to establish a southern gateway to serve the extensive and underserved southeast region of the United States. Exhibit DL-R101. The other four applicants propose to add yet another northern/midwest gateway to serve areas that already receive an abundant amount of U.S.-flag service to Toronto. Exhibit DL-R-103.

In light of the limited number of first-year Toronto opportunities available under the U.S.-Canada bilateral, authority should not be awarded to cities and regions that already enjoy U.S.-flag nonstop service to Toronto. Pittsburgh and New York/Newark receive considerable levels of nonstop service to Toronto. Exhibits DL-R-122, R-123, R-125, and R-126. Pittsburgh is served on a multiple daily nonstop basis by Delta. Exhibit DL-R-123. Pennsylvania should not get its third nonstop Toronto route and

Pittsburgh should not get its second nonstop Toronto route before Atlanta gets its first U.S.-flag nonstop service. Exhibit DL-R-122.

New York/Newark is the best-served U.S. gateway to Toronto, receiving nonstop service by several U.S. and Canadian carriers. Exhibits DL-R-125 and R-126. Newark already receives six daily nonstop flights from Air Canada. Air Canada has a substantial investment in Continental and already feeds into Continental's system at Newark and LaGuardia on a closely coordinated basis. Newark should not get its second nonstop Toronto service and New York its third before Atlanta gets its first.

The midwest also has numerous existing gateways to Toronto and receives significant levels of nonstop jet service to Toronto from two major gateways: Chicago and Detroit. The midwest should not receive its third or fourth (i.e., St. Louis or Minneapolis/St. Paul) nonstop gateway to Toronto before Atlanta and the southeast receives its first nonstop gateway.

The southeast is one of the largest areas of the United States without an effective nonstop hub gateway to Toronto. This lack of service will be exacerbated after American terminates its Nashville-Toronto nonstop service in June. Even during American's Nashville-Toronto tenure, American's level of feeder service at Nashville had been steadily declining. Delta provides almost ten times more service at Atlanta than American provided at Nashville. Hence, an award to Delta would establish the southeast's first effective hub gateway to Toronto.



Delta is the only applicant proposing service to Toronto from an underserved region that will not duplicate existing gateway hub services. TWA's proposal at St. Louis and Northwest's proposal at Minneapolis/St. Paul will essentially duplicate the behind-gateway online services currently available from American and United at their much larger Chicago hubs and from Northwest, itself, at its Detroit hub. Similarly, Continental's service would simply add a third nonstop carrier in the already well-served New York/Newark-Toronto market. With respect to Pittsburgh-Toronto, not only does that market already receive multiple daily nonstop U.S.-flag services, but USAir already has a nonstop gateway to Toronto from its nearby Philadelphia hub, which serves 64% of the behind-gateway points USAir proposes to serve via Pittsburgh. Exhibit DL-R-118.

In the absence of an award to Delta, the southeast would continue to be relegated to unacceptable one-stop or connecting services. Continental and USAir propose only a relatively small level of connecting service to the southeast. More importantly, however, the largest U.S.-Toronto market (i.e., Atlanta-Toronto) without nonstop U.S.-flag service would continue to be relegated to inferior one-stop service and most of the southeast would receive no improved service. Northwest's Minneapolis/St. Paul proposal is focused primarily on providing online connecting opportunities for western U.S. cities (cities that already receive online connecting service by Northwest via Detroit and by American and United via Chicago) and would offer little in the way of improved online connecting service to the southeast. TWA's St. Louis hub is not geographically well-positioned to serve as an effective gateway for Atlanta and much of the southeast. In fact,

TWA readily admits that its catchment area serves primarily the midwest and the Texas/Gulf Coast areas as well as the Rocky Mountains and Pacific areas, all of which have convenient online access over existing gateways.

Atlanta-Toronto is the largest market without nonstop U.S.-flag service. Atlanta-Toronto was over 75% larger in total O&D than Minneapolis/St. Paul-Toronto, over 215% larger than St. Louis-Toronto, 180% larger than Pittsburgh-Toronto.

Atlanta is also the largest metropolitan area in the eastern U.S. which had no non-stop U.S.-flag service to Toronto. With a population of 3.1 million, Atlanta is 25% larger than St. Louis, 20% larger than Minneapolis/St. Paul and 31% larger than Pittsburgh.

Delta will offer more annual seats than any other applicant. Exhibit DL-R-109. Delta also will carry more U.S.-Toronto passengers than any other applicant: 24,880 more Toronto passengers than USAir, 56,847 more than Continental, 73,855 more than Northwest and 77,709 more than TWA. Exhibit DL-R-107. In terms of forecast primary market passengers, Delta will carry more local O&D passengers in the primary (gateway-to-gateway) market than any other applicant. Delta expects to benefit 79,453 local Atlanta-Toronto O&D passengers, which is 63,894 passengers more than USAir projects between Pittsburgh and Toronto, 61,357 passengers more than Northwest projects between Minneapolis/St. Paul and Toronto, 33,223 passengers more than TWA projects between St. Louis and Toronto and 19,489 passengers more than Continental projects between New York/Newark and Toronto. Exhibit DL-R-108.

Delta's ability to generate the most U.S.-Toronto passengers is based on the large size of the historic Atlanta-Toronto local market and the strength of Delta's online feed system at Atlanta. Delta's Atlanta hub is the largest hub of any applicant for Toronto authority. At 700 daily departures serving 131 points, Delta offers more flights serving more cities at Atlanta than any other applicant offers at its proposed gateway hub. By any measure -- departures, enplanements, cities served -- Atlanta is substantially larger than any other proposed gateway. Exhibits DL-R-111, R-112 and R-113. As a consequence of the size of Delta's Atlanta hub, Delta will be able to provide online connections to more cities that do not already receive nonstop service to Toronto than Northwest, TWA or Continental: 64 cities for Delta compared to 55 cities for Northwest, 48 cities for TWA and 44 cities for Continental. Exhibit DL-R- 115.

In addition to the superior service benefits that will result from Delta's Atlanta-Toronto proposal, an award to Delta will also substantially enhance long-term market structure and competition in the U.S.-Toronto market. Delta serves Toronto from only one gateway, Pittsburgh.<sup>11</sup> Pittsburgh is not a Delta hub, but has been used by Delta as a bridge to connect Delta's Atlanta hub to Toronto on a one-stop basis. Atlanta will represent Delta's only hub gateway to Toronto. In light of the size of Delta's Atlanta connecting network, Delta's proposed service will provide substantial new intergateway competition for traffic moving between Toronto and the south/southeast.

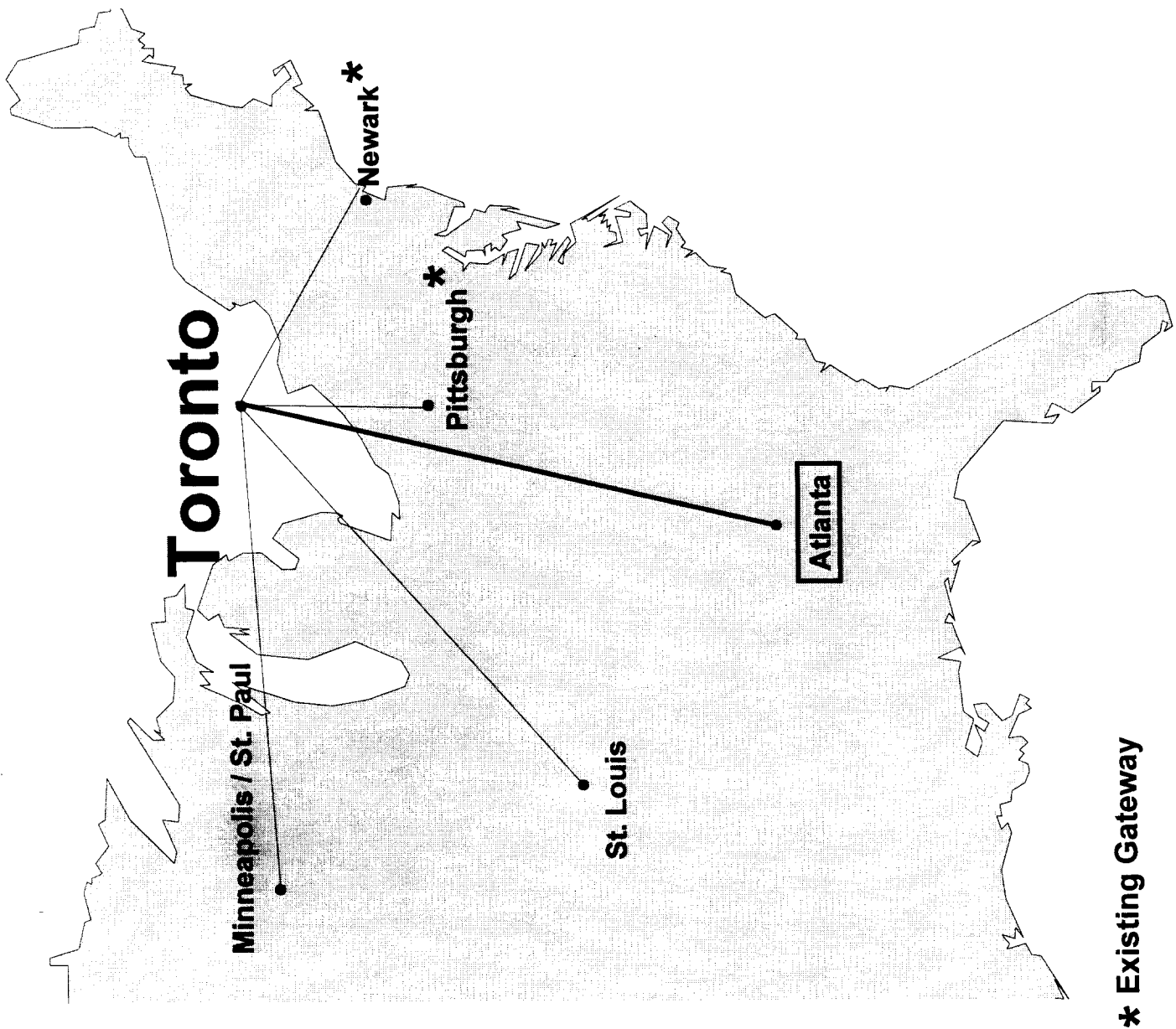
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<sup>11</sup> The Department recently approved the transfer of the Miami/Tampa-Toronto route to American Airlines.

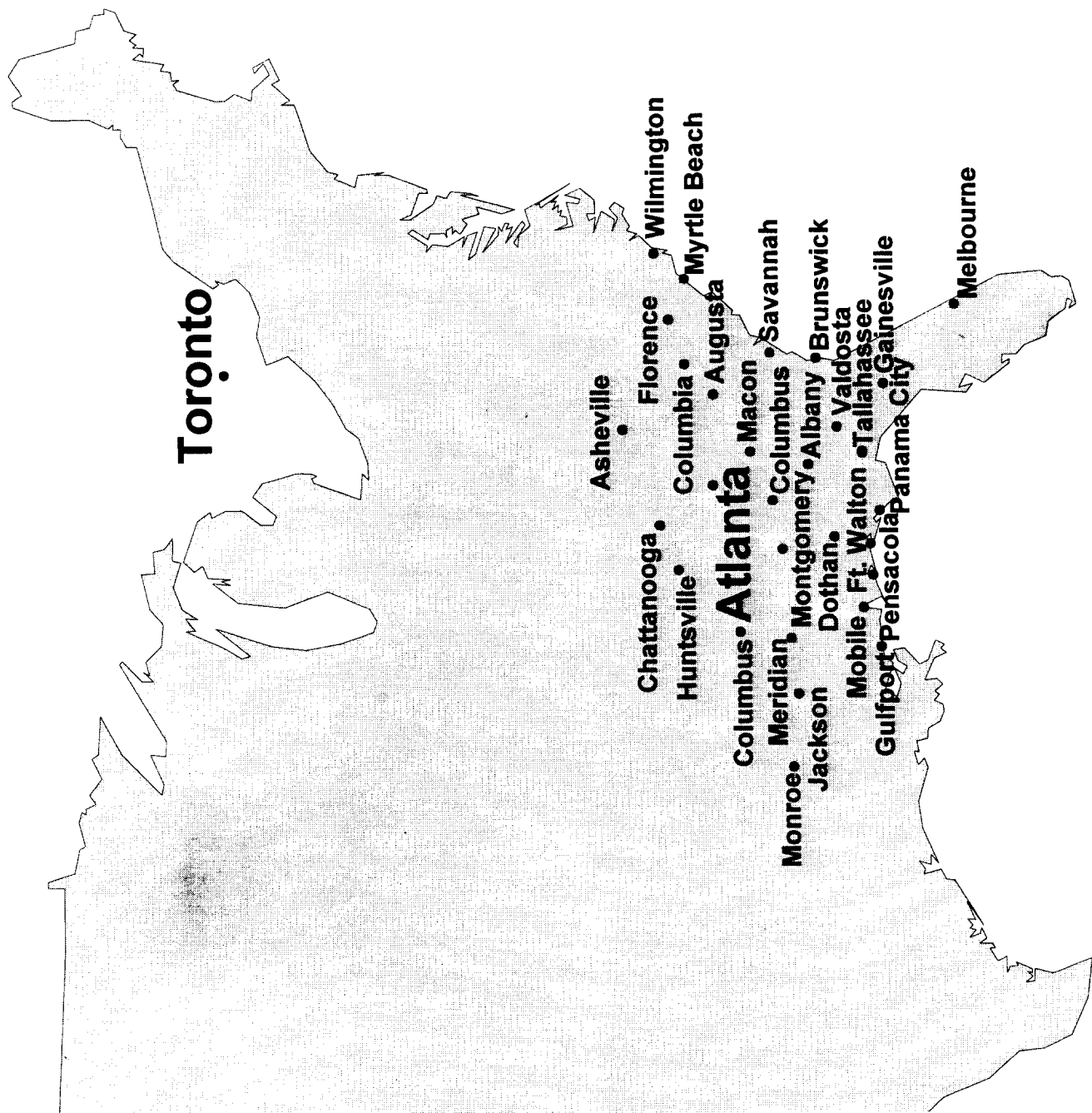
Equally important, Delta's service will provide significant intragateway competition to Toronto from one of the largest and most important cities in America. Air Canada recently inaugurated nonstop service between Atlanta and Toronto. Delta's two daily nonstop roundtrip flights (supplemented by its three daily one-stop flights via Pittsburgh) will provide important head-to-head competition against Air Canada between Atlanta and Toronto. Neither TWA nor Northwest would offer any intragateway competition. While USAir and Continental would produce some intragateway competition, the selection of either carrier would produce offsetting adverse competitive impacts. An award to USAir would diminish intergateway competition because of Pittsburgh's extremely close proximity to USAir's existing Philadelphia and Baltimore gateways. If USAir receives Washington, D.C. (National)-Toronto authority, this intergateway overlap will be worsened. An award to Continental would produce no effective competition against Air Canada, the only other airline serving Newark-Toronto on a nonstop basis. Air Canada has a substantial ownership interest in Continental and both carriers plan a close cooperative marketing arrangement. This equity and marketing partnership relationship diminishes Continental's incentive to compete against Air Canada for U.S.-Toronto traffic.

In conclusion, the record is clear that the Department's first priority in selecting a new first-year Toronto opportunity is to authorize service between Atlanta and Toronto -- the largest U.S.-Toronto market -- to serve the extensive southeast U.S. -- the largest underserved U.S. region.

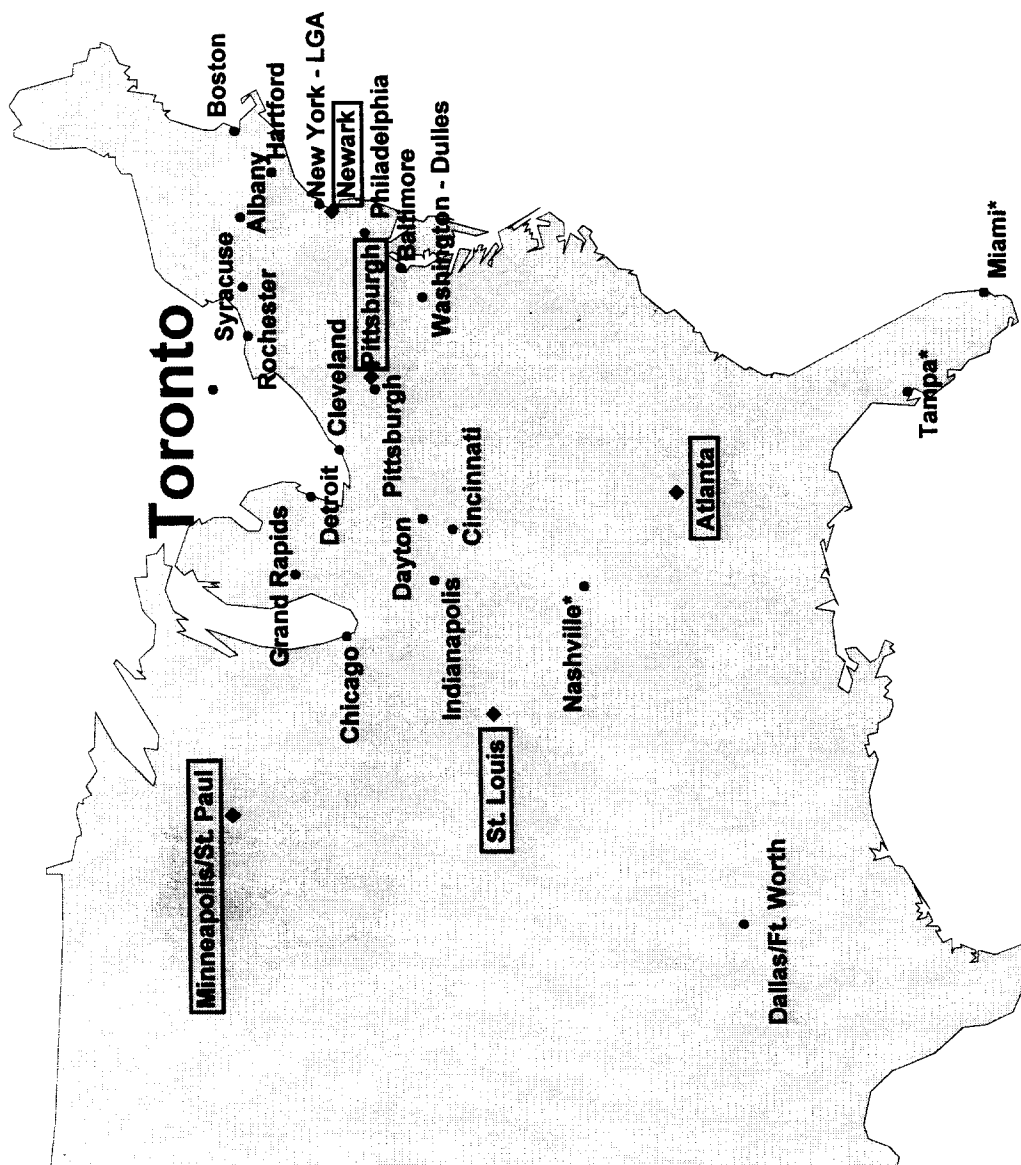
**ATLANTA IS THE ONLY PROPOSED GATEWAY  
IN THE UNDERSERVED SOUTHEAST REGION**  
(Rebuttal to CO-201, NW-202, TW-151, US-201)



**AMONG THE APPLICANT CARRIERS, DELTA'S ATLANTA PROPOSAL PROVIDES  
THE ONLY SERVICE TO TWENTY-EIGHT UNDERSERVED SOUTHEAST MARKETS**  
(Rebuttal to CO-201, NW-102, TW-151, US-201)



**THE OTHER FOUR TORONTO APPLICANTS PROPOSE GATEWAYS IN  
REGIONS WITH ABUNDANT U.S. FLAG SERVICE TO TORONTO**  
(Rebuttal to CO-201, NW-102, TW-151, US-201)



- \* (1) American Airlines has announced that it will discontinue Nashville - Toronto Service effective June 15, 1995.  
(2) Application pending to transfer Tampa / Miami - Toronto routes to American. American has advised D.O.T. that it does not intend to operate Tampa - Toronto Service.

◆ Proposed U.S. - Toronto Gateway.

● Existing U.S. - Toronto Gateway.

**DELTA EXPECTS TO CARRY FAR MORE  
 TORONTO PASSENGERS THAN ANY OTHER APPLICANT**  
 (Rebuttal to CO-301, NW-301, TW-301, US-301)

<u>Airline</u>	<u>Gateway</u>	<u>Forecast Psgrs</u>	<u>Amount Delta Greater</u>	<u>Percent Delta Greater</u>
<b>Delta</b>	<b>Atlanta</b>	<b>182,879</b>		
USAir	Pittsburgh	157,999	<b>24,880</b>	<b>16%</b>
Continental	New York	126,032	<b>56,847</b>	<b>45%</b>
Northwest	Minneapolis	109,024	<b>73,855</b>	<b>68%</b>
TWA	St. Louis	105,170	<b>77,709</b>	<b>74%</b>

Source: DL-301, CO-301, NW-301, TW-301, US-301



**DELTA EXPECTS TO CARRY MORE LOCAL  
PASSENGERS THAN ANY OTHER APPLICANT**  
(Rebuttal to CO-301, NW-301, TW-301, US-301)

<u>Airline</u>	<u>Gateway</u>	Local Toronto <u>Passengers</u>	Amount Delta <u>Greater</u>	Percent Delta <u>Greater</u>
<b>Delta</b>	<b>Atlanta</b>	<b>79,453</b>		
Continental	New York	59,964	<b>19,489</b>	<b>33%</b>
TWA	St. Louis	46,230	<b>33,223</b>	<b>72%</b>
Northwest	Minneapolis	18,096	<b>61,357</b>	<b>339%</b>
USAir	Pittsburgh	15,559	<b>63,894</b>	<b>411%</b>

Source: DL-301, CO-301, NW-301, TW-301, US-301

**DELTA WILL PROVIDE MORE  
SEATS THAN ANY OTHER APPLICANT**  
 (Rebuttal to CO-201, NW-201, TW-151, US-403)

<u>Airline</u>	<u>Gateway</u>	<u>Annual Seats 1/</u>	<u>Amount Delta Greater</u>	<u>Percent Delta Greater</u>
<b>Delta</b>	<b>Atlanta</b>	<b>257,760</b>		
USAir	Pittsburgh	250,132	<b>7,628</b>	<b>3%</b>
TWA	St. Louis	189,024	<b>68,736</b>	<b>36%</b>
Continental	New York	183,296	<b>74,464</b>	<b>41%</b>
Northwest	Minneapolis	143,200	<b>114,560</b>	<b>80%</b>

1/ Seats calculated at a 98% completion factor (365 x .98 = 358 days).

Source: DL-101, CO-201, NW-100 , NW-202, TW-151, US-403

**THE LOCAL ATLANTA-TORONTO MARKET IS  
MUCH LARGER THAN THE LOCAL MARKETS THAT  
DO NOT CURRENTLY HAVE U.S. FLAG NONSTOP SERVICE**

(Rebuttal to NW-301 and TW-301)

<u>Airline</u>	<u>Gateway</u>	Local Toronto <u>Passengers</u>	Receives Nonstop <u>Service</u>
<b>Delta</b>	<b>Atlanta</b>	<b>90,110</b>	<b>No</b>
Northwest	Minneapolis	51,290	No
TWA	St. Louis	28,570	No

Source: DL-301, NW-301, TW-301

**ATLANTA IS LARGER THAN ANY  
OTHER PROPOSED GATEWAY  
(BASED ON APPLICANT'S DEPARTURES)**  
(Rebuttal to CO-201, NW-202, TW-151, US-201)

<u>Rank 1/</u>	<u>City</u>	<u>Carrier</u>	<u>Total Departures 2/</u>
<b>1</b>	<b>Atlanta</b>	<b>Delta</b>	<b>700</b>
4	Pittsburgh	USAir	507
6	St. Louis	TWA	485
10	Northwest	Minneapolis	421
15	Newark	Continental	201

1/ - Rank among U.S. single-carrier hubs.

2/ - Includes Jet and Commuter carrier departures.

Source: Official Airline Guide, January 1995.

**ATLANTA IS LARGER THAN ANY  
OTHER PROPOSED GATEWAY  
(BASED ON APPLICANT'S ENPLANEMENTS)  
(Rebuttal to CO-201, NW-202, TW-151, US-201)**

<u>Rank 1/</u>	<u>City</u>	<u>Carrier</u>	<u>Total Enplanements</u>
<b>2</b>	<b>Atlanta</b>	<b>Delta</b>	<b>25,022,449</b>
8	Newark	Continental	11,546,506
10	St. Louis	TWA	10,891,565
12	Northwest	Minneapolis	10,218,171
19	Pittsburgh	USAir	8,832,101

1/ - Rank among U.S. single-carrier hubs.

Source: DOT Form 41, T3 Enplanement Statistics, YE September 1994

**ATLANTA IS LARGER THAN ANY  
OTHER PROPOSED GATEWAY  
(BASED ON MARKETS SERVED BY APPLICANTS)**  
(Rebuttal to CO-201, NW-202, TW-151, US-201)

<u>Rank 1/</u>	<u>City</u>	<u>Carrier</u>	<u>Markets Served 2/</u>
2	Atlanta	Delta	139
4	Minneapolis	Northwest	123
5	Pittsburgh	USAir	117
12	St. Louis	TWA	101
17	Newark	Continental	84

1/ - Rank among U.S. single-carrier hubs.

2/ - Includes all Jet and Commuter markets.

Source: Official Airline Guide, January 1995.

**DELTA'S ATLANTA HUB OFFERS MORE THAN  
DOUBLE THE NUMBER OF DAILY SEAT DEPARTURES  
THAN ANY OTHER APPLICANT'S GATEWAY HUB**  
(Rebuttal to CO-201, NW-201, TW-151, US-201)

<u>Airline</u>	<u>Gateway</u>	<u>Average Daily Seats</u>	<u>Amount Delta Greater</u>	<u>Percent Delta Greater</u>
<b>Delta</b>	<b>Atlanta</b>	<b>86,564</b>		
USAir	Pittsburgh	40,445	<b>46,119</b>	<b>114%</b>
Northwest	Minneapolis	38,994	<b>47,570</b>	<b>122%</b>
TWA	St. Louis	36,281	<b>50,283</b>	<b>139%</b>
Continental	New York	29,966	<b>56,598</b>	<b>189%</b>

Source: Official Airline Guide, January 1995 and Airline Seating  
Guide, U.S. Edition

**DELTA WILL PROVIDE ONLINE CONNECTIONS TO  
MORE CITIES THAT DO NOT ALREADY RECEIVE NONSTOP  
SERVICE TO TORONTO THAN NORTHWEST, TWA, OR CONTINENTAL**

(Rebuttal to CO-301, NW-301, TW-301)

<u>Airline</u>	<u>Gateway</u>	<u>Number Of Cities Served</u>	<u>Amount Delta Greater</u>	<u>Percent Delta Greater</u>
<b>Delta</b>	<b>Atlanta</b>	<b>64</b>		
Northwest	Minneapolis	55	<b>9</b>	<b>16%</b>
TWA	St. Louis	48	<b>16</b>	<b>33%</b>
Continental	New York	44	<b>20</b>	<b>45%</b>

Source: DL-201, DL-113, NW-301, CO-301, TW-301

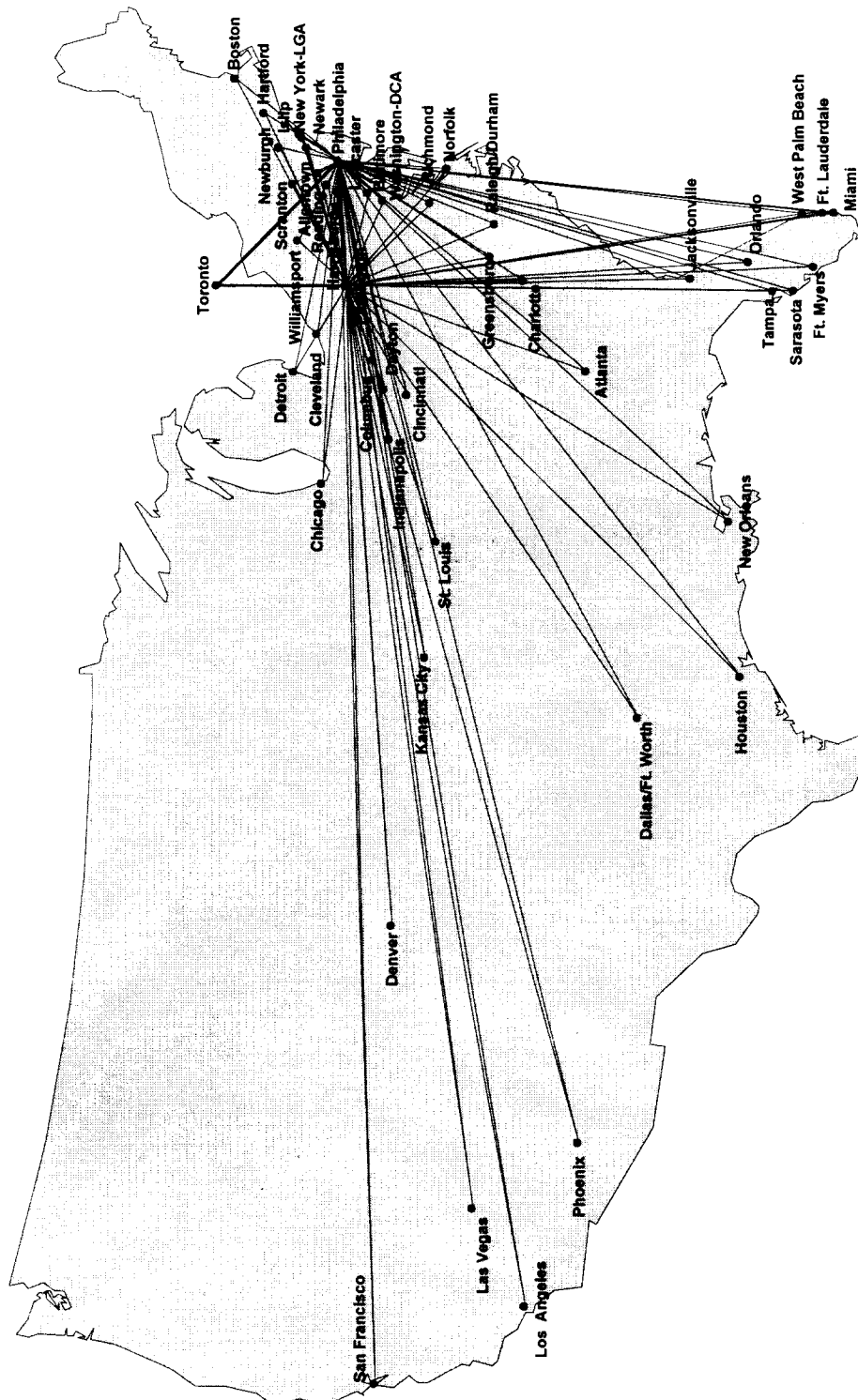


**DELTA WILL PROVIDE MORE FIRST  
NONSTOP-TO-NONSTOP SERVICES  
THAN ANY OTHER APPLICANT**  
(Rebuttal to CO-301, NW-301, TW-301, US-301)

<u>Airline</u>	<u>Gateway</u>	<u>O&amp;D Passengers</u>	<u>Amount Delta Greater</u>	<u>Percent Delta Greater</u>
<b>Delta</b>	<b>Atlanta</b>	<b>30,060</b>		
Northwest	Minneapolis	7,840	<b>22,220</b>	<b>283%</b>
Continental	New York	4,440	<b>25,620</b>	<b>577%</b>
TWA	St. Louis	1,860	<b>28,200</b>	<b>1516%</b>
USAir	Pittsburgh	1,800	<b>28,260</b>	<b>1570%</b>

Source: CO-301, NW-301, TW-301, US-301

**USAIR'S PITTSBURGH PROPOSAL WILL DUPLICATE THEIR EXISTING SERVICE FROM PHILADELPHIA IN FORTY-SIX MARKETS**  
(Rebuttal to US-201)



Source: Official Airline Guide, January 1995, US 201 & 204

**NEARLY SIXTY-FOUR PERCENT OF USAIR'S  
PITTSBURGH FORECAST DUPLICATES TORONTO  
MARKETS USAIR ALREADY SERVES OVER PHILADELPHIA**

(Rebuttal to US-301)

<u>City 1/</u>	USAir Forecast <u>Passengers</u>
Allentown, PA	914
Atlanta, GA	934
Baltimore, MD	1,032
Boston, MA	1,703
Charlotte, NC	3,208
Chicago, IL-ORD	1,656
Cincinnati, OH	456
Cleveland, OH	2,969
Columbus, OH	1,930
Dallas/Ft. Worth, TX	2,074
Dayton, OH	501
Denver, CO	2,867
Detroit, MI	987
Fort Lauderdale, FL	3,309
Fort Myers, FL	1,817
Greensboro, NC	878
Harrisburg, PA	1,557
Hartford, CT	2,188
Houston, TX-IAH	566
Indianapolis, IN	1,584
Islip, NY	285
Jacksonville, FL	980
Kansas City, MO	2,119
Lancaster, PA	165
Las Vegas, NV	1,656
Los Angeles, CA	4,060
Newburgh, NY	246
Norfolk, VA	526
Orlando, FL	8,156
Philadelphia, PA	2,635
Phoenix, AZ	5,296

**NEARLY SIXTY-FOUR PERCENT OF USAIR'S  
PITTSBURGH FORECAST DUPLICATES TORONTO  
MARKETS USAIR ALREADY SERVES OVER PHILADELPHIA**

(Rebuttal to US-301)

<u>City 1/</u>	USAir Forecast <u>Passengers</u>
Raleigh/Durham, NC	2,036
Reading, PA	173
Richmond, VA	859
San Francisco, CA	2,021
Sarasota, FL	1,219
Scranton, PA	670
St. Louis, MO	3,112
Tampa, FL	12,878
Washington, D.C.-DCA	1,073
West Palm Beach, FL	3,120
Williamsport, PA	<u>280</u>
	86,695

USAir's Beyond  
Pittsburgh Forecast: 136,364

**USAir's Duplicate  
Markets As % Of Beyond 64%**

1/ Connections at Philadelphia based on two hour maximum  
connection time and a thirty minute minimum connection time.

Source: US-301  
Official Airline Guide, January 1995

**THIRTY - FOUR PERCENT OF USAIR'S FORECAST  
TRAFFIC IS IN MARKETS WITH NONSTOP SERVICE**  
(Rebuttal to US-301)

<u>City</u>	<u>Forecast Passengers Per Day</u>	<u>Nonstop Service Offered</u>
Albany, NY	0.4	Yes
Baltimore, MD	2.8	Yes
Boston, MA	4.8	Yes
Chicago, IL	4.6	Yes
Cincinnati, OH	1.3	Yes
Cleveland, OH	8.3	Yes
Dallas/Ft. Worth, TX	5.8	Yes
Dayton, OH	1.4	Yes
Grand Rapids, MI	2.8	Yes
Hartford, CT	6.1	Yes
Houston, TX	1.6	Yes
Indianapolis, IN	4.4	Yes
Los Angeles, CA	11.3	Yes
Philadelphia, PA	7.4	Yes
Pittsburgh, PA	43.5	Yes
San Francisco, CA	5.6	Yes
Tampa, FL	36.0	Yes
Washington, D.C.	3.0	Yes
 Total Of Nonstop Markets:	 151.1	
Total Onboard Traffic Forecast:	441.3	
Nonstop Markets As % Of Total	<b>34%</b>	

Source: Exhibit US-301, Exhibit DL-134

**TWENTY-TWO PERCENT OF USAIR'S FORECAST IS IN MARKETS  
WITH MORE THAN TWO HOURS CONNECTING TIME**

(Rebuttal to US-301)

Number Of Connecting Services Exceeding 2 Hours:	76
Total Number Of Connecting Services:	340
Percent Services Exceeding 2 Hours Of Total:	<b>22%</b>
Percent Of Connecting Services Delta Exceeds 2 Hours:	<b>0%</b>

Source: US-301

**USAIR FORECASTS 76 CONNECTING SERVICES  
WITH A CONNECTION TIME EXCEEDING 2 HOURS**  
(Rebuttal to US-204)

<u>Connection At</u> <u>Pittsburgh To:</u>	<u>Number Of</u> <u>Connections</u>	<u>Connection At</u> <u>Pittsburgh To:</u>	<u>Number Of</u> <u>Connections</u>
Akron, OH	1	Miami, FL	1
Albany, NY	1	Morgantown, WV	2
Allentown, PA	2	New York - La Guardia	1
Altoona, PA	1	Newark, NJ	2
Ashland, KY	1	Newburgh, NY	2
Baltimore, MD	2	Newport News, VA	1
Boston, MA	2	Norfolk, VA	1
Bradford, PA	1	Parkersburg, WV	1
Buffalo, NY	2	Philadelphia, PA	1
Burlington, VT	2	Portland, ME	1
Charlotte, NC	2	Providence, RI	1
Clarksburg, WV	1	Raleigh/Durham, NC	2
Cumberland, MD	3	Reading, PA	3
Du Bois, PA	1	Richmond, VA	1
Elmira/Corning, NY	1	Roanoke, VA	2
Erie, PA	1	Rochester, NY	2
Franklin, PA	1	Saginaw, MI	1
Greensboro/Highpoint, N	1	Sarasota/Bradenton, FL	1
Hagerstown, MD	2	Scranton, PA	1
Harrisburg, PA	4	Syracuse, NY	1
Hartford, CT	3	Utica, NY	1
Ithaca/Courtland, NY	1	Washington, DC	3
Jamestown, NY	1	West Palm Beach, FL	1
Lancaster, PA	2	White Plains, NY	1
Manchester, NH	1	Williamsport, PA	2
			76

Source: US-204

**PENNSYLVANIA SHOULD NOT RECEIVE  
ITS THIRD TORONTO DESIGNATION  
BEFORE ATLANTA RECEIVES ITS FIRST  
(Rebuttal to US-201)**

<u>City</u>	One-Way Weekly <u>Flights</u>
Philadelphia	28
Pittsburgh	26
<b>Atlanta</b>	<b>0</b>

Source: Official Airline Guide, January 1995



**USAIR'S PITTSBURGH-TORONTO PROPOSED  
SCHEDULES WINGTIP EXISTING SERVICES**  
(Rebuttal to US-201)

	<u>Market</u>	<u>Carrier</u>	<u>Eqp.</u>	<u>Dept. Time</u>	<u>Arrv. Time</u>	<u>Frequency</u>
	<b>PIT-YYZ</b>	<b>DL</b>	<b>757</b>	<b>12:10</b>	<b>13:15</b>	<b>Daily</b>
	<b>PIT-YYZ</b>	<b>DL</b>	<b>72S</b>	<b>15:55</b>	<b>16:54</b>	<b>Daily</b>
<i>Proposed</i>	<i>PIT-YYZ</i>	<i>US</i>	<i>757</i>	<i>16:00</i>	<i>17:00</i>	<i>Daily</i>
	<b>PIT-YYZ</b>	<b>DL</b>	<b>757</b>	<b>19:40</b>	<b>20:40</b>	<b>Daily</b>
<i>Proposed</i>	<i>PIT-YYZ</i>	<i>US</i>	<i>757</i>	<i>21:15</i>	<i>22:15</i>	<i>Daily</i>
	<b>YYZ-PIT</b>	<b>DL</b>	<b>757</b>	<b>7:30</b>	<b>8:39</b>	<b>Daily</b>
<i>Proposed</i>	<i>YYZ-PIT</i>	<i>US</i>	<i>757</i>	<i>7:55</i>	<i>8:55</i>	<i>Daily</i>
	<b>YYZ-PIT</b>	<b>DL</b>	<b>757</b>	<b>14:15</b>	<b>15:12</b>	<b>Daily</b>
	<b>YYZ-PIT</b>	<b>DL</b>	<b>72S</b>	<b>18:10</b>	<b>19:12</b>	<b>Daily</b>
<i>Proposed</i>	<i>YYZ-PIT</i>	<i>US</i>	<i>757</i>	<i>18:25</i>	<i>19:25</i>	<i>Daily</i>

Source: US-201, Official Airline Guide, March, 1995

**USAIR'S PROPOSED SINGLE PLANE SERVICE PROVIDES NO  
IMPROVEMENT IN ELAPSED TIME OVER EXISTING SERVICE**

(Rebuttal to US-201)

<b><u>Proposed Service</u></b>			<b><u>Current Best Elapsed Time</u></b>		<b><u>USAir's Differential</u></b>
<b><u>Carrier</u></b>	<b><u>O&amp;D Market</u></b>	<b><u>Elapsed Time</u></b>	<b><u>Carrier</u></b>	<b><u>Time</u></b>	
USAir	MCO-YYZ	4:15	DL	3:50	0:25 Slower
USAir	YYZ-MCO	4:08	DL	4:05	0:03 Slower

<b><u>Proposed Service</u></b>			<b><u>Current Best Elapsed Time</u></b>		<b><u>USAir's Differential</u></b>
<b><u>Carrier</u></b>	<b><u>O&amp;D Market</u></b>	<b><u>Elapsed Time</u></b>	<b><u>Carrier</u></b>	<b><u>Time</u></b>	
USAir	PHX-YYZ	6:45	UA/DL	5:30	1:15 Slower
USAir	YYZ-PHX	6:30	AA	6:05	0:25 Slower

<b><u>Proposed Service</u></b>			<b><u>Current Best Elapsed Time</u></b>		<b><u>USAir's Differential</u></b>
<b><u>Carrier</u></b>	<b><u>O&amp;D Market</u></b>	<b><u>Elapsed Time</u></b>	<b><u>Carrier</u></b>	<b><u>Time</u></b>	
USAir	SAN-YYZ	6:14	UA	6:05	0:09 Slower
USAir	YYZ-SAN	7:28	AA	6:39	0:49 Slower

<b><u>Proposed Service</u></b>			<b><u>Current Best Elapsed Time</u></b>		<b><u>USAir's Differential</u></b>
<b><u>Carrier</u></b>	<b><u>O&amp;D Market</u></b>	<b><u>Elapsed Time</u></b>	<b><u>Carrier</u></b>	<b><u>Time</u></b>	
USAir	SEA-YYZ	6:15	AA	6:03	0:12 Slower
USAir	YYZ-SEA	7:27	DL	6:30	0:57 Slower

**THE NEW YORK METROPOLITAN AREA HAS  
COMPREHENSIVE NEW YORK/NEWARK-TORONTO SERVICE**

(Rebuttal to CO - 201)

Existing NYC-Canada <u>Nonstops</u>	<u>Carrier</u>	One-Way Weekly <u>Frequencies</u>	One-Way Weekly <u>Seats</u>
YYZ-LGA	American	47	6,825
	Air Canada	51	5,782
YYZ-JFK	Air Canada	1	137
YYZ-EWR	Air Canada	<u>39</u>	<u>4,410</u>
		138	17,154

Source: Official Airline Guide, January 1995

**THE NEW YORK/NEWARK AREA  
HAS THE MOST U.S.-TORONTO SERVICE  
(Rebuttal to CO-201)**

<u>Rank</u>	<u>Toronto Market</u>	<u>One-Way Weekly Seats</u>
1	New York/Newark	17,154
2	Chicago	15,323
3	Detroit	6,195
4	Boston	6,139
5	Miami	5,691

Source: DL-134

**GRANT OF CONTINENTAL'S APPLICATION WILL  
INCREASE NEW YORK CITY/NEWARK-TORONTO  
CAPACITY BY ONLY TEN PERCENT**

(Rebuttal to CO-201)

	One-Way Weekly <u>Seats</u>
Existing NYC-YYZ Seats	17,154
CO's Proposed Seats	1,792
Percent Increase In Market	10%

Source: CO Exhibit-A, DL-134

**SIXTY PERCENT OF CONTINENTAL'S FORECAST  
IS IN MARKETS WITH NONSTOP SERVICE \***  
(Rebuttal to CO Exhibit 301)

<u>City</u>	<u>Annual Forecast Passenger</u>	<u>Nonstop Service Offered</u>
Albany, NY	206	Yes
Baltimore, MD	562	Yes
Cleveland, OH	1,178	Yes
Dayton, OH	446	Yes
Hartford, CT	2,426	Yes
Houston, TX	672	Yes
Indianapolis, IN	483	Yes
Miami, FL	2,514	Yes
New York/Newark	59,964	Yes
Philadelphia, PA	1,238	Yes
Tampa, FL	4,768	Yes
Washington, D.C.	1,062	Yes
Total Of Above Markets:	75,519	
Total Onboard Traffic Forecast:	126,032	
Above Markets As % Of Total:	<b>60%</b>	

\* Nonstop Service Permitted Under Bilateral.

Source: CO-301, Exhibit DL-134, Official Airline Guide, January 1995

**CONTINENTAL'S NEWARK-TORONTO PROPOSED  
SCHEDULES WINGTIP EXISTING SERVICES**  
(Rebuttal to CO-201)

**Northbound Service**

<u>Market</u>	<u>Carrier</u>	<u>Eqp.</u>	<u>Dept. Time</u>	<u>Arrv. Time</u>	<u>Frequency</u>
LGA-YYZ	AA	M80	6:55	8:21	X7
LGA-YYZ	AC	D9S	7:30	9:00	X67
EWR-YYZ	AC	D9S	8:10	9:40	X7
LGA-YYZ	AA	72S	8:30	10:00	Daily
LGA-YYZ	AC	D9S	9:05	10:27	67
LGA-YYZ	AC	320	9:05	10:34	X67
EWR-YYZ	AC	D9S	10:30	12:00	Daily
LGA-YYZ	AC	D9S	10:50	12:10	Daily
LGA-YYZ	AA	M80	11:15	12:45	Daily
LGA-YYZ	AA	72S	12:30	13:59	Daily
EWR-YYZ	AC	320	12:45	14:20	X67
LGA-YYZ	AC	D9S	12:50	14:15	Daily
<i>Proposed</i> EWR-YYZ	CO	733	15:04	16:34	Daily
LGA-YYZ	AA	M80	15:45	17:20	Daily
LGA-YYZ	AC	D9S	15:55	17:20	7
LGA-YYZ	AC	767	15:55	17:25	X67
EWR-YYZ	AC	D9S	16:15	17:45	X67
JFK-YYZ	AC	AB3	16:55	18:35	3
LGA-YYZ	AC	D9S	17:15	18:38	Daily
EWR-YYZ	AC	D9S	17:20	18:50	X6
LGA-YYZ	AA	72S	17:45	19:19	Daily
EWR-YYZ	AC	D9S	18:55	20:20	X6
LGA-YYZ	AC	D9S	19:15	20:38	X67
<i>Proposed</i> EWR-YYZ	CO	733	20:30	22:00	Daily
EWR-YYZ	AC	320	20:20	21:50	67
LGA-YYZ	AA	72S	20:30	21:55	X6
LGA-YYZ	AC	D9S	21:20	22:43	Daily

**CONTINENTAL'S NEWARK-TORONTO PROPOSED  
SCHEDULES WINGTIP EXISTING SERVICES**  
(Rebuttal to CO-201)

<b><u>Southbound Service</u></b>						
<u>Market</u>	<u>Carrier</u>	<u>Eqp.</u>	<u>Dept. Time</u>	<u>Arrv. Time</u>	<u>Frequency</u>	
YYZ-LGA	AA	M80	7:00	8:25	X7	
YYZ-LGA	AC	D9S	7:05	8:29	X6	
YYZ-EWR	AC	D9S	7:50	9:16	Daily	
YYZ-JFK	AC	AB3	8:00	9:40	4	
<i>Proposed</i> YYZ-EWR	CO	733	8:10	9:30	Daily	
YYZ-LGA	AC	D9S	8:55	10:15	Daily	
YYZ-LGA	AA	M80	9:25	10:47	Daily	
YYZ-EWR	AC	320	10:40	12:10	Daily	
YYZ-LGA	AA	72S	10:45	12:06	Daily	
YYZ-LGA	AC	D9S	10:50	12:08	Daily	
YYZ-LGA	AC	D9S	13:25	14:44	7	
YYZ-LGA	AC	767	13:25	14:47	X67	
YYZ-LGA	AA	M80	13:35	14:59	Daily	
YYZ-EWR	AC	D9S	13:45	15:04	X6	
YYZ-EWR	AC	D9S	15:15	16:34	Daily	
YYZ-LGA	AC	D9S	15:18	16:37	Daily	
YYZ-LGA	AA	72S	15:30	16:53	Daily	
YYZ-LGA	AC	D9S	17:15	18:39	X67	
YYZ-EWR	AC	D9S	17:30	18:58	X6	
YYZ-LGA	AA	M80	17:34	19:00	Daily	
<i>Proposed</i> YYZ-EWR	CO	733	17:50	19:10	Daily	
YYZ-LGA	AC	D9S	19:30	20:47	Daily	
YYZ-EWR	AC	D9S	19:55	21:14	X6	
YYZ-LGA	AA	72S	20:05	21:24	X6	
YYZ-LGA	AC	D9S	20:55	22:07	X6	

Source: CO-201, Official Airline Guide, January 1995



**CONTINENTAL'S PROPOSED SINGLE PLANE SERVICE PROVIDES  
NO IMPROVEMENT IN ELAPSED TIME OVER EXISTING SERVICE**

(Rebuttal to CO-201)

**Proposed Service**

**Current Best Elapsed Time**

<b>Carrier</b>	<b>O&amp;D Market</b>	<b>Elapsed Time</b>
Continental	FLL-YYZ	5:40
Continental	YYZ-FLL	5:05

<b>Carrier</b>	<b>Time</b>	<b>Continental's Differential</b>
DL	4:15	1:25 Slower
DL	4:20	0:45 Slower

**Proposed Service**

**Current Best Elapsed Time**

<b>Carrier</b>	<b>O&amp;D Market</b>	<b>Elapsed Time</b>
Continental	MCO-YYZ	5:14
Continental	YYZ-MCO	5:18

<b>Carrier</b>	<b>Time</b>	<b>Continental's Differential</b>
DL	3:50	1:24 Slower
DL	4:05	1:13 Slower

**TWELVE PERCENT OF TWA'S FORECAST  
IS IN MARKETS WITH NONSTOP SERVICE \***  
(Rebuttal to TW-301)

<u>City</u>	<u>Annual Forecasted Passenger</u>	<u>Nonstop Service Offered</u>
Dallas/Ft. Worth, TX	2,350	Yes
Houston, TX	486	Yes
Los Angeles, CA	5,235	Yes
Nashville, TN	978	Yes
San Francisco, CA	3,791	Yes
Total Of Above Markets:	12,840	
Total Onboard Traffic Forecast:	105,170	
Above Markets As % Of Total:	<b>12%</b>	

\* Nonstop Service Permitted Under Bilateral.

Source: TW-301, Exhibit DL-134, Official Airline Guide, January 1995

**TWA'S ST. LOUIS-TORONTO PROPOSAL FORECASTS  
FIVE PERCENT OF TOTAL TRAFFIC TO EIGHT CANADIAN  
CITIES VS. DELTA'S FORECAST OF NO INTERLINE CONNECTIONS**

(Rebuttal to TW-301)

<u>Airline</u>	<u>Gateway</u>	<u>Interline Connections</u>
TWA	St. Louis	Ottawa Halifax London Sudsbury Sault St. Marie Thunder Bay North Bay St. Johns
Forecast Passengers		
From Canada Interline:		4,900
Total Traffic Forecast:		105,170
Canada Interline		
As % Of Total:		5%

Source: DL-301, TW-301

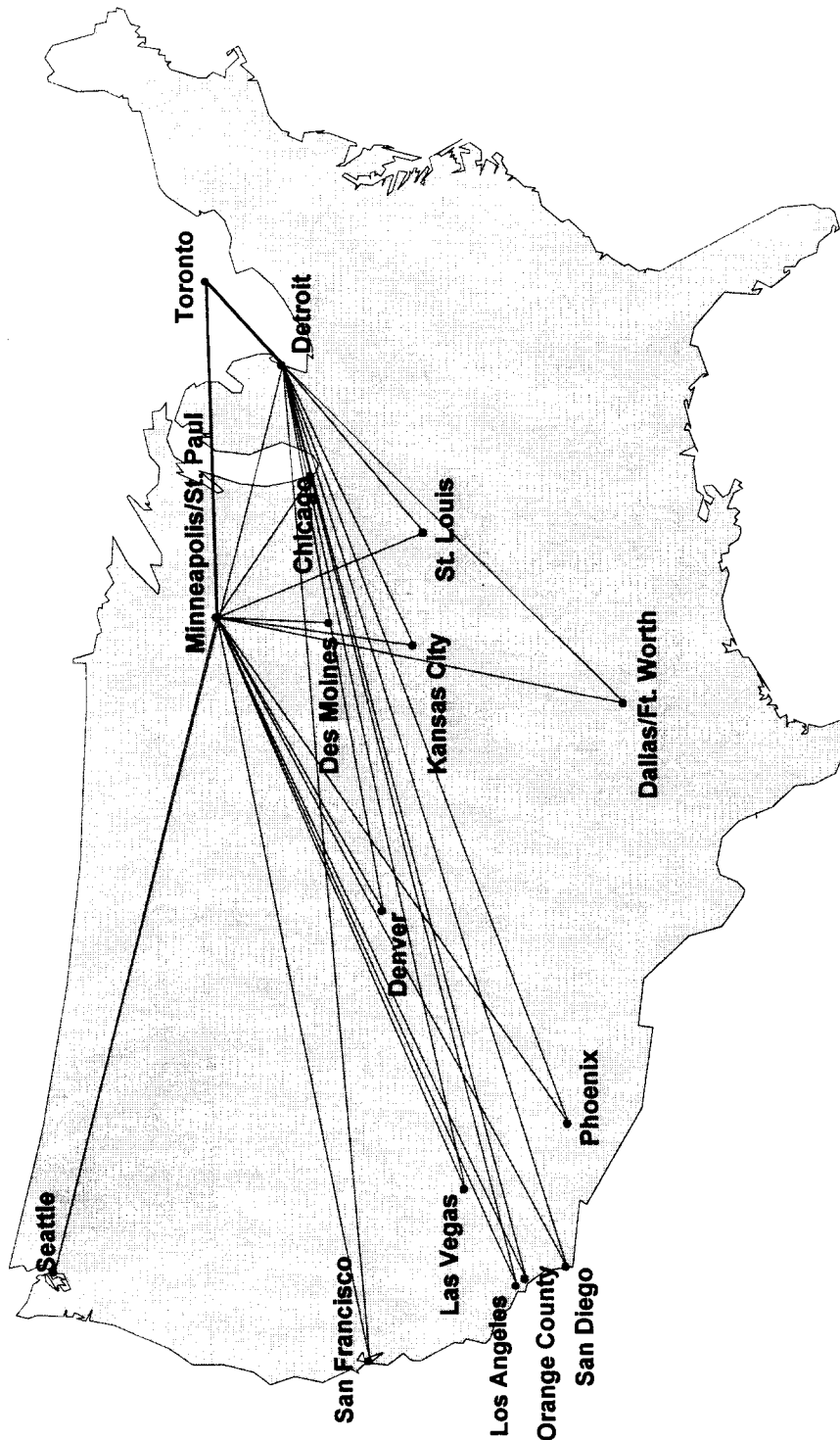
**TWA'S PROPOSED SINGLE PLANE SERVICE PROVIDES VIRTUALLY  
NO IMPROVEMENT IN ELAPSED TIME OVER EXISTING SERVICE**

(Rebuttal to TW-151)

<b><u>Proposed Service</u></b>			<b><u>Current Best Elapsed Time</u></b>		<b><u>TWA's Differential</u></b>
<b><u>Carrier</u></b>	<b><u>O&amp;D Market</u></b>	<b><u>Elapsed Time</u></b>	<b><u>Carrier</u></b>	<b><u>Time</u></b>	
TWA	PHX-YYZ	5:25	UA/DL	5:30	0:05 Faster
TWA	YYZ-PHX	6:24	AA	6:05	0:19 Slower

<b><u>Proposed Service</u></b>			<b><u>Current Best Elapsed Time</u></b>		<b><u>TWA's Differential</u></b>
<b><u>Carrier</u></b>	<b><u>O&amp;D Market</u></b>	<b><u>Elapsed Time</u></b>	<b><u>Carrier</u></b>	<b><u>Time</u></b>	
TWA	SAN-YYZ	6:26	UA	6:05	0:21 Slower
TWA	YYZ-SAN	6:45	AA	6:39	0:06 Slower

**NORTHWEST'S MINNEAPOLIS PROPOSAL WILL DUPLICATE THEIR EXISTING  
SERVICE FROM DETROIT IN THIRTEEN MAJOR O&D MARKETS**  
(Rebuttal to NW-202)



**OVER FORTY PERCENT OF NORTHWEST'S  
MINNEAPOLIS FORECAST DUPLICATES MARKETS  
NORTHWEST SERVES OVER DETROIT TO TORONTO**  
(Rebuttal to NW-301)

<u>City 1/</u>	Northwest Forecast <u>Passengers</u>
Chicago, IL 2/	3,212
Dallas/Ft. Worth, TX 2/	2,280
Denver, CO	4,164
Des Moines, IA	2,241
Kansas City, MO	2,044
Las Vegas, NV	5,341
Los Angeles, CA	2,646
Orange County, CA	2,707
Phoenix, AZ	5,473
San Diego, CA	1,986
San Francisco, CA	1,868
Seattle, WA	1,604
St. Louis, MO	<u>3,048</u>
	38,614

Northwest's Beyond  
Toronto Forecast: 90,928

**Northwest's Duplicate  
Markets As % Of Beyond 42%**

1/ Connections at Detroit based on two hour maximum  
connection time and a thirty minute minimum connection time.

2/ Already receives U.S. Flag nonstop service.

Source: NW-301, Official Airline Guide, January 1995

**TWENTY CITIES IN NORTHWEST'S TORONTO FORECAST,  
REPRESENTING OVER 270,000 BASE YEAR O&D PASSENGERS,  
HAVE SINGLE CONNECTIONS IN ONE DIRECTION ONLY  
(Rebuttal to NW-301)**

<u>City</u>	<u>O&amp;D Passengers</u>
Anchorage, AK	2,360
Brainerd, MN	120
Dallas/Ft. Worth, TX	102,130
Detroit, MI	76,510
Eau Claire, WI	200
Fort Dodge, IA	50
Grand Rapids, MN	80
Hancock, MI	160
Hibbing, MN	120
Honolulu, HI	17,290
Kansas City, MO	19,990
La Crosse, WI/Winona, MN	960
Missoula, MT	360
Pierre, SD	30
Rochester, MN	3,710
Saint Cloud, MN	0
San Diego, CA	32,030
San Jose, CA	16,090
Thief River Falls, MN	10
Waterloo, IA	740
 Total Of Above Markets:	 272,940
Total Forecast O&D:	1,363,110
Above Markets As % Of Total:	<b>20%</b>

Source: NW-301, NW-203

**FIFTEEN PERCENT OF NORTHWEST'S  
TORONTO FORECAST, REPRESENTING  
OVER 16,000 PASSENGERS, HAVE SINGLE  
CONNECTIONS IN ONE DIRECTION ONLY**

(Rebuttal to NW-301)

<u>City</u>	Northwest Forecast <u>Passengers</u>
Anchorage, AK	439
Brainerd, MN	90
Dallas/Ft. Worth, TX	2,280
Detroit, MI	1,565
Eau Claire, WI	150
Fort Dodge, IA	38 1/
Grand Rapids, MN	6 1/
Hancock, MI	120 1/
Hibbing, MN	92
Honolulu, HI	519 1/
Kansas City, MO	2,044
La Crosse, WI/Winona, MN	804
Missoula, MT	270 1/
Pierre, SD	23 1/
Rochester, MN	3,106
Saint Cloud, MN	9
San Diego, CA	1,986
San Jose, CA	1,996
Thief River Falls, MN	9 1/
Waterloo, IA	620 1/
 Total Of Above Markets:	 16,166
Total Onboard Traffic Forecast:	109,024
Above Markets As % Of Total:	<b>15%</b>

1/ NW offers no connecting service in either direction.

Source: Exhibit NW-301, Exhibit NW-203



**TWELVE CITIES IN NORTHWEST'S TORONTO  
FORECAST HAVE 75% MARKET SHARES,  
REPRESENTING OVER 6,400 O&D PASSENGERS,  
BUT HAVE SINGLE CONNECTIONS IN ONE DIRECTION ONLY  
(Rebuttal to NW-301)**

<u>City</u>	<u>O&amp;D Passengers</u>
Brainerd, MN	120
Eau Claire, WI	200
Fort Dodge, IA	50
Hancock, MI	160
Hibbing, MN	120
La Crosse, WI/Winona, MN	960
Missoula, MT	360
Pierre, SD	30
Rochester, MN	3,710
Saint Cloud, MN	0
Thief River Falls, MN	10
Waterloo, IA	<u>740</u>
	6,460

Source: NW-301, NW-203

**ELEVEN PERCENT OF NORTHWEST'S FORECAST  
IS IN MARKETS WITH NONSTOP SERVICE \***  
(Rebuttal to NW-108)

<u>City</u>	<u>Annual Forecast Passengers</u>	<u>Nonstop Service Offered</u>
Chicago, IL	3,212	Yes
Dallas/Ft. Worth, TX	2,280	Yes
Detroit, MI	1,565	Yes
Los Angeles, CA	2,646	Yes
San Francisco, CA	1,868	Yes
Total Of Above Markets:	11,571	
Total Onboard Traffic Forecast:	109,024	
Above Markets As % Of Total:	11%	

\* Nonstop Service Permitted Under Bilateral.

Source: NW-108, Exhibit DL-134, Official Airline Guide, January 1995

**NORTHWEST'S PROPOSED SINGLE PLANE SERVICE PROVIDES VIRTUALLY  
NO IMPROVEMENT IN ELAPSED TIME OVER EXISTING SERVICE**

(Rebuttal to NW-202)

<u>Proposed Service</u>			<u>Current Best Elapsed Time</u>		<u>Northwest's Differential</u>
<u>Carrier</u>	<u>O&amp;D Market</u>	<u>Elapsed Time</u>	<u>Carrier</u>	<u>Time</u>	
Northwest	BOI-YYZ	5:38	UA	5:30	0:08 Slower
Northwest	YYZ-BOI	5:48	UA	6:35	0:47 Faster

<u>Proposed Service</u>			<u>Current Best Elapsed Time</u>		<u>Northwest's Differential</u>
<u>Carrier</u>	<u>O&amp;D Market</u>	<u>Elapsed Time</u>	<u>Carrier</u>	<u>Time</u>	
Northwest	SLC-YYZ	5:18	DL	5:30	0:12 Faster
Northwest	YYZ-SLC	5:41	AA	5:09	0:32 Slower

**CONTINENTAL AND AIR CANADA  
ARE PARTNERS, NOT COMPETITORS**  
(Rebuttal to CO Exhibits A-D)

Toronto - Year 1  
Exhibit DL-R-141  
Page 1 of 2

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**HEADLINE: AIR CANADA CELEBRATES FIRST YEAR OF PROFITABLE  
ALLIANCE  
WITH CONTINENTAL**

**DATELINE: MONTREAL, Apr. 29,**

**BODY:**

On the first anniversary of Air Canada's alliance with Continental Airlines, the agreement has already distinguished itself as an innovator among airline alliances and a major generator of revenues and jobs for Air Canada.

"By the end of this year, the agreement will have generated approximately \$ 51 million in maintenance revenue, \$ 2.9 million in savings through joint purchasing plus millions of dollars in additional passenger revenue," said Air Canada Chairman, President and CEO Hollis L. Harria. "The alliance is rapidly proving itself to be a winner in terms of bringing revenues, benefits and jobs to Canada and Air Canada."

It was just one year ago that Air Canada completed its investment of \$ 107 (CAN) million in common shares and preferred shares of Continental Airlines, Inc. Today Air Canada is a 20% owner of the U.S.'s fifth largest airline and a player in the North American big leagues.

Almost immediately after the ink was dry on the agreement, Air Canada and Continental began squeezing synergies out of a comprehensive strategic alliance.

Air Canada immediately doubled services to Continental's Newark hub and began twice daily service from Toronto to Houston, Continental's hub. Air Ontario and Continental are co-ordinating schedules at Continental's Cleveland mini-hub.

Beyond scheduling and marketing, the two airlines are working together to

offer mutual services where there are concrete benefits for both partners. For example, Continental is providing ground handling for Air Canada at some U.S. airports while Air Canada is serving as General Sales Agent for Continental in France and performing ground handling for Continental cargo in London, England.

On the maintenance side, Air Canada estimates that airframe and engine maintenance work contracts from Continental will generate approximately \$ 51 million in contract revenues by the end of 1994.

And, thanks to joint purchasing and inventory sharing, Air Canada will realize another \$ 2.9 million in savings by the end of 1994.

"In our day-to-day operations, we are finding that it just makes plain, good sense to use our combined buying power to save money," said Harris. "That applies to just about anything and everything we buy together from plastic cups and garbage bags to jet fuel."

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April 4, 1995

By Hand Delivery

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U.S. Department of Transportation  
400 Seventh Street, S.W.  
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Washington, D.C. 20590

**Re: U.S.-Toronto Service Proceeding**  
**Docket 50168**

Dear Ms. Adams:

Enclosed please find eight copies of the Rebuttal Exhibits of Delta Air Lines, Inc. in the above-referenced proceeding. One copy of the requested diskette has been delivered to Mr. William McCamant per the Department's request. Copies of the Rebuttal Exhibits have been hand-delivered today to Washington representatives and served on other parties by overnight service.

Respectfully submitted,



Robert E. Cohn  
Counsel for Delta Air Lines, Inc.

Enclosures

cc: All Parties

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